

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA
2023 NOV 14 PM 12:20

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL REIS,

Defendant.

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INDICTMENT
18 U.S.C. §§ 1591(a)&(b)(2)

The Grand Jury charges that

COUNT I

Between on or about January 3, 2022, and on or about July 1, 2022, in the District of Nebraska and elsewhere, in and affecting interstate commerce, the defendant, MICHAEL REIS, did knowingly recruit, entice, harbor, transport, provide, maintain, and obtain a minor female identified as MINOR VICTIM 1, and having had a reasonable opportunity to observe MINOR VICTIM 1 and knowing and in reckless disregard that MINOR VICTIM 1 was under the age of 18 years old and knowing and in reckless disregard that MINOR VICTIM 1 would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a) and (b)(2).

FORFEITURE ALLEGATION

1. The allegation contained in Count I of this Indictment is hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 1594(d).

2. Pursuant to 18 U.S.C. § 1594(d), upon conviction of an offense in violation of 18 U.S.C. § 1591, the defendant, MICHAEL REIS, shall forfeit to the United States:

- a. any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of the offense; and
- b. any property, real or personal, constituting or derived from, any proceeds that the defendant obtained, directly or indirectly, as a result of the offense.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of defendant MICHAEL REIS up to the value of said property listed above as being subject to forfeiture.

Criminal forfeiture, in violation of Title 18, United States Code, Section 1594.

A TRUE BILL.

FOREPERSON

The United States of America requests that trial of this case be held in Omaha, Nebraska, pursuant to the rules of this Court.


KELLI L. CERAOLO, MN #0398049
Assistant U.S. Attorney